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K002210

Submitter's Name:

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Contact:

Ann Marie Pahlman or Robert L. Wilkinson

**Date Prepared:** July 17, 2000

Trade Name:

SYNTRA™ Dialyzer

Common Name:

Dialyzer

**Classification Name:** 

High Permeability Hemodialysis System

per 21 CFR 876.5860

Equivalent predicate:

PSN<sup>TM</sup> Polysynthane Dialyzer Cobe Centrysystem 14 PES Cobe Arylane-H Dialyzer Gambro Polyflux-S Dialyzer

Gambro HC 14R Hemoconcentrator

Fresenius Hemoflow Dialyzer

**Device Description:** 

Model 120 and Model 160 Dialyzers

**Intended Use:** 

Hemodialysis with SYNTRATM is indicated for patients with renal failure when conservative therapy is judged to be inadequate. It also may be indicated in the treatment of

patients intoxicated with poisons or drugs.

Summary of the **Technological Predicate Device:** 

The general function and materials of the subject SYNTRATM Dialyzers are the same as the Baxter PSNTM Dialyzers cleared under K980656 & K980658, the Cobe Centrysystem 14 PES Dialyzer cleared under K955592, the Cobe Arylane-H Dialyzer cleared under K982413, the Gambro Polyflux-S Dialyzer cleared under K982414, the

Gambro HC 14R Hemoconcentrator cleared under

K951311, and the Fresenius Hemoflow Dialyzer cleared under K926005. Reference to equivalence as outlined in

this submission is in no way related to the term

"equivalent" or similar terminology as outlined under the

patent laws.

Clinical data:

N/A

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#### Conclusions drawn:

Components of the subject SYNTRA<sup>TM</sup> Dialyzers have met the biological requirements of ISO 10993-1: Biological Evaluation of Medical Devices – Part: Guidance on selection of tests.

Validation of the gamma sterilization cycle for the SYNTRA™ Dialyzer is based upon AAMI/ISO 11137-1994 "Sterilization of Healthcare Products - Requirements for Validation and Routine Control - Radiation Sterilization."

Pyrogen testing of the subject dialyzers meets the requirements of USP 24 (ref. 2) <161>, Transfusion and Infusion Assemblies and Similar Medical Devices.

Particles are counted per USP XXIII Monograph <788>. This procedure is performed initially for information only and is not a release criteria at this time.

Functional testing for blood side integrity and conformance to manufacturing specifications are performed as in-process and/or final inspections prior to product release to ensure a quality product.

Additional information requested by FDA:

None to date.

Official Correspondent:

Robert L. Wilkinson

Director, Regulatory Affairs

Date

Prepared by:

Ann Marie Pahlman

Manager, Regulatory Affairs

for



Food and Drug Administration 9200 Corporate Boulevard Rockville MD 20850

# FEB 1 4 2001

Robert L. Wilkinson, RAC Director Regulatory Affairs Baxter Healthcare Corporation 1620 Waukegan Road MCGAW PARK IL 60085-6730

Dear Mr. Wilkinson:

Re: K002210

SYNTRA™ 120 and 160 Hemodialyzers

Dated: January 15, 2001 Received: January 16, 2001 Regulatory Class: II

21 CFR §876.5860/Procode: 78 KDI

We have reviewed your Section 510(k) notification of intent to market the device referenced above and we have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (Premarket Approval), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 895. A substantially equivalent determination assumes compliance with the Current Good Manufacturing Practice requirements, as set forth in the Quality System Regulation (QS) for Medical Devices: General regulation (21 CFR Part 820) and that, through periodic QS inspections, the Food and Drug Administration (FDA) will verify such assumptions. Failure to comply with the GMP regulation may result in regulatory action. In addition, FDA may publish further announcements concerning your device in the Federal Register. Please note: this response to your premarket notification submission does not affect any obligation you might have under sections 531 through 542 of the Act for devices under the Electronic Product Radiation Control provisions, or other Federal laws or regulations.

This letter will allow you to begin marketing your device as described in your 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801 and additionally 809.10 for <u>in vitro</u> diagnostic devices), please contact the Office of Compliance at (301) 594-4639. Additionally, for questions on the promotion and advertising of your device, please contact the Office of Compliance at (301) 594-4639. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR 807.97). Other general information on your responsibilities under the Act may be obtained from the Division of Small Manufacturers Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its internet address "http://www.fda.gov/cdrh/dsma/dsmamain.html".

Sincerely yours

Daniel G. Schultz, M.D.

Captain, USPHS

Acting Director, Division of Reproductive, Abdominal, and Radiological Devices

Office of Device Evaluation

Center for Devices and Radiological Health

## **Indications for Use Statement**

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**Device Name** 

SYNTRA™ Dialyzer

Indications for Use Use

Hemodialysis with SYNTRA™ is indicated for patients with renal failure when conservative therapy is judged to be inadequate. It also may be indicated in the treatment of patients intoxicated with poisons or drugs.

PLEASE DO NOT WRITE BELOW THIS LINE - CONTINUE ON ANOTHER PAGE IF NEEDED

Concurrence of CDRH, Office of Device Evaluation (ODE)

Prescription Use (Per 21 CFR 801.109)

OR

Over-The-Counter Use\_

(Division Sign-Off)

Division of Reproductive, Abdominal, ENT,

and Radiological Devices